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*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION, Plaintiff, v. BERNARD L. MADOFF INVESTMENT SECURITIES LLC, Defendant.	Adv. Pro. No. 08-01789 (CGM) SIPA LIQUIDATION (Substantively Consolidated)
In re: BERNARD L. MADOFF, Debtor.	
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, Plaintiff, v. ORBITA CAPITAL RETURN STRATEGY LIMITED, Defendant.	Adv. Pro. No. 11-02537 (CGM)

**CERTIFICATE OF NO OBJECTION TO MOTION FOR
ENTRY OF ORDER, PURSUANT TO SECTION 105(a) OF
THE BANKRUPTCY CODE AND RULES 2002 AND 9019 OF
THE FEDERAL RULES OF BANKRUPTCY PROCEDURE,
APPROVING SETTLEMENT AGREEMENT**

Irving H. Picard (the “Trustee”), as trustee for the liquidation of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III, and the substantively consolidated Chapter 7 estate of Bernard L. Madoff, by and through his undersigned counsel, submits this certificate of no objection pursuant to Local Bankruptcy Rule 9075-2, and respectfully represents:

1. On July 13, 2021, the Trustee filed a motion (the “Motion”) for entry of an order approving a Settlement Agreement by and between the Trustee and defendant Orbita Capital Return Strategy Limited (“Defendant”) pursuant to Section 105(a) of the Bankruptcy Code and Rules 2002 and 9019 of the Federal Rules of Bankruptcy Procedure (Adv. Pro. No. 11-02537 (CGM), ECF No. 98).

2. The deadline for filing objections to the Motion expired on August 4, 2021, at 5:00 p.m. A hearing on the Motion has been scheduled for August 18, 2021, at 10:00 a.m.

3. Pursuant to the Order Establishing Notice Procedures (*Sec. Inv’r Prot. Corp. v. Bernard L. Madoff Inv. Sec. LLC*, No. 08-01789 (CGM), ECF No. 4560) (the “Notice Order”), notice of the Motion was provided by U.S. Mail postage prepaid or email to: (i) Defendant; (ii) all parties included in the Master Service List as defined in the Notice Order; (iii) all parties that filed a notice of appearance in this case; (iv) the SEC; (v) the IRS; (vi) the United States Attorney for the Southern District of New York; and (vii) SIPC.

4. Counsel has reviewed the Court’s docket not less than forty-eight (48) hours after expiration of the time to file an objection, and to date, no objection, responsive pleading, or request for a hearing with respect to the Motion appears thereon. Additionally, no party has indicated to the Trustee that it intends to oppose the relief requested in the Motion.

5. An electronic copy of the proposed order (the “Order”), that is substantially in the form of the proposed order that was annexed to the Motion will be submitted to the Court, along with this certificate.

6. Pursuant to Local Bankruptcy Rule 9075-2, the Trustee respectfully requests that the Order be entered without a hearing.

Dated: August 9, 2021
New York, New York

Respectfully submitted,

BAKER & HOSTETLER LLP

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